

**UNITED STATES DISTRICT COURT  
IN AND FOR THE SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 9:24-cv-81532-DMM**

SOHAIL KIYANI

Plaintiff,

v.

RIC L. BRADSHAW, in his capacity as  
Sheriff of Palm Beach County, Florida

Defendant.

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**DEFENDANT'S MOTION TO CONTINUE AND/OR MODIFY TRIAL DATE**

Defendant, Ric Bradshaw, in his official capacity as Sheriff of Palm Beach County, Florida, pursuant to Local Rule 7.6, hereby moves the Court to modify the Calendar Call and Trial Date set in the Court's Order Referring Case and Setting Trial Date [ECF No. 9] and, in support provides following as the basis for its request:

1. On December 10, 2024, Plaintiff filed his Complaint against Defendant alleging violations of Title VII of the Civil Rights Act of 1964, as amended, the Florida Civil Rights Act, and the Americans with Disabilities Act. *See* ECF. No. 9.
2. Plaintiff is still employed with Defendant.
3. Defendant filed its Answer and Affirmative Defenses on January 2, 2025. *See* ECF No. 9.
4. On January 13, 2025, the Court issued its Order Referring Case and Setting Trial Date, which sets this matter for trial during the two-week trial period commencing August 11, 2025, at 9:00 a.m. and Calendar Call for Wednesday, August 6, 2025. *See* ECF. No. 9.

5. Unfortunately, prior to the issuance of this Order, undersigned booked, and paid for, a family vacation and will be out of the state from August 1 through August 11, 2025. Specifically, undersigned purchased non-refundable flights and is flying from Miami to Honolulu on August 1, 2025, and returning to Miami on August 11, 2025. Undersigned has also booked the stay for herself and her family, which is non-refundable. Undersigned can provide the Court with any booking documents that may be required.

6. Pursuant to Local Rule 7.6, attached is the supporting affidavit by Suhaill M. Morales, Esq.

7. Accordingly, Defendant requests that the Calendar Call and Trial Date be continued/modified to the next trial period in September 2025.

8. Defendant seeks this modification for good cause and in good faith. Additionally, this is a brief continuance and will not prejudice any of the Parties, but a failure to modify the Calendar Call and Trial Date would substantially impact undersigned.

**Local Rule 7.1(a)(2)**

Undersigned has conferred with Plaintiff's counsel who consents to the relief sought.

WHEREFORE, Defendant respectfully requests the Court modify its Order Referring Case and Setting Trial Date and continue to this case to the September 2025 trial period.

Date: January 17, 2025

Respectfully submitted,

/s/Suhaill M. Morales  
Suhaill M. Morales, Esq.  
Florida Bar No. 84448  
SMM Law P.A.  
7900 NW 155 Street, Suite 203  
Miami Lakes, FL 33016  
305-518-7026  
smorales@smmlawfirm.com

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document was served via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing on all counsel or parties of record.

/s/Suhaill M. Morales  
Suhaill M. Morales